

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

JANE DOE1, JANE DOE 2, JANE DOE 3,  
JANE DOE 4, JANE DOE 5, K.T. AND M.T.,  
PERSONAL REPRESENTATIVES TO JANE  
DOE 6, JANE DOE 7, JANE DOE 8, AND  
JANE DOE 9,

Plaintiffs,

v.

Case No. 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.

**NON-PARTY'S RESPONSE TO THE PLAINTIFFS'  
REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, the Non-Party, Alunda Rutherford, by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 45(d)(3), with her response to the Plaintiffs' request for production of documents.

1. All Documents Relating to the following companies:
  - a) Glass and Concrete Contracting, LLC- No documents for this company in her possession.
  - b) Skyline Contractor's Group, LLC- No documents for this company in her possession.
  - c) Lauren Madison Bastidas Property, LLC- No knowledge of this company nor does she have any documents for this company in her possession.
  - d) Strategic Investigations and Security, LLC- No knowledge of this company nor does she have any documents for this company in her possession.
  - e) Universal TSCM Group, LLC- No knowledge of this company nor does she have any documents for this company in her possession.

- f) Southern Construction and Consulting, LLC- this is the company she started that no longer is in operation and she has no documents relating to this company in her possession.
- g) Stone and Ox Properties, LLC- No knowledge of this company nor does she have any documents for this company in her possession.
- h) Team Oxendine, LLC- No documents for this company in her possession.
- i) Davis Brother's Roofing, LLC- No documents for this company in her possession.

2. All documents relating to the following individuals:

- a) Sean Williams- No documents relating to him in her possession.
- b) Bart Mikitowicz- No documents relating to him in her possession.
- c) Mitzi Emig- No documents relating to her in her possession.
- d) Patricia Burke- No knowledge of this individual and no documents relating to her in her possession.
- e) Juan Bastidas- No knowledge of this individual and no documents relating to him in her possession.
- f) Casey Oxendine- No documents relating to him in her possession.
- g) James R. Davis- No documents relating to him in her possession.
- h) Wanda Patterson- No documents relating to her in her possession.

3. All documents relating to any business(es) associated with the following addresses:

- a) 217 East Market Street, Ste. 110- No documents relating to business in her possession.

- b) 15441 12<sup>th</sup> Avenue- No knowledge of this business and no documents relating to this business in her possession.
- c) 154-41 12<sup>th</sup> Avenue- No knowledge of this business and no documents relating to this business in her possession.
- d) 705 East Myrtle Avenue- This is Ms. Rutherford's house and not a business.
- e) 112 View Bend Street- No knowledge of this business and no documents relating to this business in her possession.
- f) 2916 Bristol Highway- No knowledge of this business and no documents relating to this business in her possession.
- g) 2234 SW Edison Circle- No documents relating to this business in her possession.
- h) 200 East Main Street, Ste. 500- No documents relating to this business in her possession.
- i) 756 West King Street 2<sup>nd</sup> Fl- No knowledge of this business and no documents relating to this business in her possession.
- j) 303 Falling Waters Road- No knowledge of this business and no documents relating to this business in her possession.
- k) 305 Messick Avenue- No knowledge of this business and no documents relating to this business in her possession.

4. All social media posts relating to Sean Williams.

The Non-Party has made no posts or comments relating to Sean Williams on social media.

Respectfully submitted,

/s/ Jerome Cochran  
Jerome Cochran (020446)  
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Counsel for Non-Party

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2024, I electronically filed the foregoing document with the Court's CM/ECF filing system. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system.

/s/ Jerome Cochran  
Jerome Cochran